

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:
Carol and Gerald VanNorman,
Debtor(s)

Case No. 5:15-bk-02082-RNO
Chapter 13

OJECTION TO NOTICE OF DEFAULT

1. US Bank Select Portfolio filed a notice of default a copy is attached.
2. The debtors were advised by Select Portfolio that the notice provided an incorrect amount however are unable to provide the correct amount at this time.
3. The debtors request that default not be entered until such time the proper amount is provided to debtors.

Wherefore, it is requested certification default not be entered and the stay remain.

/s/
Randall W. Turano, Esquire
Attorney for Debtor(s)

KML LAW GROUP, P.C.
THE BNY INDEPENDENCE CENTER
701 MARKET STREET SUITE- 5000
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May 30, 2019

Randall W. Turano Esq.
802 Monroe Street
Stroudsburg, PA 18360

RE: **NOTICE OF DEFAULT UNDER COURT APPROVED STIPULATION**

U.S. Bank National Association, as Trustee, successor in interest to Bank of America, National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee for Bear Stearns Asset Backed Securities Trust 2003-HE1, Asset Backed Certificates Series 2003-HE1 vs. Carol H. VanNorman and Gerald M. VanNorman
Case No. 15-02082 RNO
Last 4 Digits of Loan No. 8385

Dear Sir or Madam:

Please be advised that your client is in default under the terms of the Stipulation that was approved by the Bankruptcy Court. Under the terms of the Stipulation, your client must cure the default within fifteen (15) days of this Notice. The amount in default is itemized as follows;

- Regular mortgage payment for the month of October 2018 in the amount of \$1,184.31 per month;
- Regular mortgage payments for the months of November 2018 through May 2019, in the amount of \$1,186.56 per month
- Installment payments for the month of September 2018 through January 2019, in the amount of \$260.17;
- Installment payment for the month of February 2019, in the amount of \$260.20;
- Less Debtor Suspense credit in the amount of \$41.99;

The total due is \$11,009.29 and must be received on or before June 14, 2019.

- The monthly payment for June, will be due on the 1st day of the month and is not included in the figure listed above.

NOTICE TO BORROWER: Please call your attorney with any questions. We are not permitted under the Rules of Professional Responsibility to speak with you directly.

As set forth in the Stipulation, only **certified funds, money order, or a check from an attorney trust account will be accepted to cure the default.** We will not accept cash or personal checks. If you have proof that payments were made, fax that proof to our office at **215-825-6413**. If payment is not made, we will file a Certification with the Court and request relief from the Bankruptcy stay. Due to heightened security in our office complex, you **MUST** call our office at **215-627-1322** and schedule an appointment if you intend to pay the amount in person, please reference our file number 145717BK.

KML Law Group, P.C.
/s/ James C. Warmbrodt, Esquire
James C. Warmbrodt, Esquire
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106



cc: Carol H. VanNorman Gerald M. VanNorman
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CERTIFICATE OF SERVICE

I certify that on June 13, 2019, a copy of the Objection To Notice of Default was served by electronic mail (ECF) to:

James C. Warmbrodt, Esquire, Attorney for U.S. Bank/Select Portfolio

/s/ _____
Randall W. Turano, Esquire
Attorney for Debtor(s)